

LUPKIN PLLC

80 Broad Street, Suite 1301
New York, NY 10004

Tel: (646) 367-2771
Fax: (646) 219-4870
www.lupkinpllc.com

November 4, 2022

VIA ECF & HAND DELIVERY

The Honorable Lewis A. Kaplan
United State District Judge
United States Courthouse
200 Worth Street
New York, New York 10007

Re: *Terra Towers Corp., et al., v. Telecom Business Solution, LLC, et al.*
Case No. 1:22-cv-07301-LAK

Dear Judge Kaplan:

We represent Petitioners Terra Towers Corp., TBS Management S.A., and DT Holdings, Inc. Pursuant to Federal Rule of Civil Procedure 5.2(d), Petitioners respectfully seek leave to file under seal their Reply in support the Amended Petition and the supporting declaration and exhibits thereto (collectively, the “Reply”).

The Arbitration out of which this proceeding arises is governed by a procedural order that requires the parties to:

treat the details of the Arbitration as private and confidential, except to the extent necessary to comply with mandatory applicable laws, including regulatory obligations, court orders, or orders of a regulatory or an administrative body, or to comply with obligations to insurers, auditors, accountants, or investors. In such cases, the disclosure shall not extend beyond what is legally required and any nongovernmental recipients shall commit to maintain the information in confidence.¹

The Reply contains information that would be covered by the foregoing confidentiality order. Petitioners will promptly confer with Respondents concerning what portions, if any, of the reply papers should remain filed under seal. In the meantime, for the reasons set forth herein, Respondents respectfully request leave to file their reply papers under seal.

¹ Procedural Order No. 2, ¶ 22 (ECF No. 5-6).

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Respectfully submitted,

/s/ Michael B. Smith
Michael B. Smith

Counsel for-Petitioners

cc: all Counsel of Record (via ECF)